

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

In Re: AUTOMOTIVE PARTS ANTITRUST
LITIGATION

Master File No. 2:12-md-02311

Judge: Hon. Sean F. Cox

This Document Relates To:

In Re: Automotive Wire Harness Case	2:17-cv-12054
In Re: Instrument Panel Clusters Case	2:17-cv-12030
In Re: Bearings Case	2:17-cv-12006
In Re: Fuel Senders Case	2:17-cv-12018
In Re: Heater Control Panel Case	2:17-cv-12024
In Re: Alternators Case	2:17-cv-11995
In Re: Anti-Vibrational Rubber Parts Case	2:17-cv-11997
In Re: Windshield Wiper Systems Case	2:17-cv-12049
In Re: Radiators Case	2:17-cv-12037
In Re: Starters Case	2:17-cv-12041
In Re: Ignition Coils Case	2:17-cv-12029
In Re: Motor Generators Case	2:17-cv-12034
In Re: Ballasts Case	2:17-cv-12028
In Re: Inverters Case	2:17-cv-12032
In Re: Electronic Powered Steering Assemblies Case	2:17-cv-12011
In Re: Fuel Injection Systems Case	2:17-cv-12013
In Re: Power Window Motors Case	2:17-cv-12035
In Re: Automatic Transmission Fluid Warmers Case	2:17-cv-11999
In Re: Valve Timing Control Devices Case	2:17-cv-12044
In Re: Air Conditioning Systems Case	2:17-cv-11992
In Re: Windshield Washer Systems Case	2:17-cv-12048
In Re: Spark Plugs, Standard Oxygen Sensors, Air Fuel Ratio Sensors Case	2:17-cv-12039
In Re: Automotive Hoses Case	2:17-cv-12001
In Re: Ceramic Substrates Case	2:17-cv-12007
In Re: Power Window Switches Case	2:17-cv-11979
In Re: Steel Tubes Case	2:20-cv-11249
In Re: Access Mechanisms Case	2:20-cv-11251
In Re: Automotive Constant Velocity Joint Boot Products Case	2:20-cv-11254
In Re: Automotive Lamps Case	2:20-cv-11255
In Re: Body Sealing Products Case	2:20-cv-11256
In Re: Brake Hoses Case	2:20-cv-11257
In Re: Exhaust Systems Case	2:20-cv-11258
In Re: Interior Trim Products Case	2:20-cv-11259
In Re: Occupant Safety Restraint Systems Case	2:20-cv-11260

In Re: Shock Absorbers Case	2:20-cv-11261
In Re: Side-Door Latches and Latch Minimodules Case	2:20-cv-11262
In Re: Steering Angle Sensors Case	2:20-cv-11263
In Re: Switches Case	2:20-cv-11264

**JOINT MOTION TO STAY ALL PROCEEDINGS BETWEEN
DEALER OPT-OUT PLAINTIFFS AND CERTAIN DEFENDANTS**

The Dealer Opt-Out Plaintiffs¹ and certain Defendants (the “Moving Defendants”)² [REDACTED]

[REDACTED]. The Dealer Opt-Out Plaintiffs

¹ Group 1 Automotive, Inc. as Assignee on Behalf of Group 1 Automotive Wholly-owned Subsidiary Dealerships, Asbury Automotive Group, Inc. as Assignee on Behalf of Asbury Automotive Wholly-owned Subsidiary Dealerships, Berkshire Hathaway, Inc. (as successor to Van Tuyl Group, LLC) as Assignee on Behalf of Assignor Dealerships, Major Automotive Companies, Inc. as Assignee on Behalf of Major Automotive Wholly-owned Subsidiary Dealerships, Bronx Ford, Inc., and City World Motors, LLC.

² Aisan Industry Co., Ltd.; Franklin Precision Industry, Inc.; Aisan Corporation of America; Hyundam Industrial Co., Ltd.; Aisin Seiki Co., Ltd.; Aisin Automotive Casting, LLC; ALPHA Corporation; Alpha Technology Corporation; Alps Alpine Co., Ltd. (f/k/a Alps Electric Co., Ltd.); Alps Electric (North America), Inc.; Alps Automotive Inc.; Robert Bosch GmbH; Robert Bosch LLC; Bridgestone Corporation; Bridgestone APM Company; Brose Schliebsysteme GmbH & Co Kommanditgesellschaft; Brose North America; Marelli Corporation (f/k/a Calsonic Kansei Corporation); Marelli North America, Inc. (f/k/a CalsonicKansei North America, Inc.); Chiyoda Manufacturing Corporation; Chiyoda USA Corporation; Continental Automotive Systems, Inc.; Continental Automotive Electronics, LLC; Continental Automotive Korea, Ltd.; Corning Incorporated; Corning International Kabushiki Kaisha; DENSO Corporation; DENSO International America, Inc.; DENSO Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); DENSO Automotive Deutschland GmbH; ASMO Co., Ltd.; ASMO North America, LLC; ASMO Greenville of North Carolina, Inc.; ASMO Manufacturing, Inc.; Diamond Electric Mfg. Co., Ltd.; Diamond Electric Mfg. Corporation; Eberspächer Exhaust Technology GmbH & Co. KG; Eberspächer North America Inc.; Furukawa Electric Co., Ltd.; American Furukawa, Inc.; G.S. Electech, Inc.; G.S. Wiring Systems, Inc.; G.S.W. Manufacturing, Inc.; Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi Metals, Ltd.; Hitachi Metals America, Ltd.; Hitachi Cable America, Inc.; INOAC Corporation; INOAC Group North America, LLC; INOAC USA, Inc.; JTEKT Corporation; JTEKT North America Corporation (formerly Koyo Corporation of U.S.A.); JTEKT Automotive North America, Inc.; Kiekert AG; Koito Manufacturing Co., Ltd.; North American Lighting, Inc.; Leoni Wiring Systems, Inc.; Leonische Holding Inc.; Maruyasu Industries Co., Ltd.; Curtis-Maruyasu America, Inc.; Mikuni Corporation; Mikuni American Corporation; Mitsubishi Heavy Industries, Ltd.; Mitsubishi Heavy Industries Climate Control, Inc.; Mitsubishi Heavy Industries America, Inc.; Nachi-Fujikoshi Corporation; Nachi America, Inc.; NGK Insulators, Ltd.; NGK Automotive Ceramics USA, Inc.; NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.), Inc.; NTK Technologies, Inc.; Nishikawa Rubber Co., Ltd.; NSK Ltd.; NSK Americas, Inc.; NSK Steering Systems Co., Ltd.; NSK Steering Systems America, Inc.; NTN Corporation; NTN USA Corporation; Nidec Mobility Corporation (formerly known as “Omron Automotive Electronics Co., Ltd.”); Sanoh Industrial Co., Ltd.; Sanoh America, Inc.; Schaeffler Group USA Inc.; Showa Corporation; American Showa, Inc.; SKF USA Inc.; Stanley Electric Co., Ltd.; Stanley Electric U.S. Co., Inc.; II Stanley Co., Inc.; Sumitomo Electric Industries, Ltd.; Sumitomo Electric Wiring Systems, Inc.; K&S Wiring Systems, Inc.; Sumitomo Wiring Systems, Ltd.; Sumitomo Wiring Systems (U.S.A), Inc.; Sumitomo Riko Company Limited; SumiRiko Ohio, Inc. (f/k/a DTR Industries, Inc.); Tenneco Inc., Tenneco GmbH;

and Moving Defendants move for an immediate stay of all proceedings between them [REDACTED]

[REDACTED] (the “Stay”). The Stay would apply, among other things, to Moving Defendants’ requirements to answer or otherwise respond to the complaints filed in the above-captioned actions. The Stay would not apply to dismissals pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) and will have no effect on the proceedings between the Dealer Opt-Out Plaintiffs and any non-Moving Defendants.

Dated: September 24, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September, 2020, I caused a true and correct copy of the foregoing **JOINT MOTION TO STAY ALL PROCEEDINGS BETWEEN DEALER OPT-OUT PLAINTIFFS AND CERTAIN DEFENDANTS** to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Joseph Gay